



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CMP/AMC
F. #2011R00414

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 10, 2014

By ECF

The Honorable Nina Gershon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Dunn, Hymowitz and Freeman
Criminal Docket No. 11-683 (S-2)(NG)

Dear Judge Gershon:

The government respectfully proposes the following special questions for *voir dire*, to be asked in addition to the Court's customary questions:

1. Do you currently work or have you ever worked as an attorney, paralegal, legal secretary or other position in the legal industry? Have your friends and family ever worked in such a capacity?
2. Have you ever worked in the real estate industry, such as for a real estate developer? Have your friends and family ever worked in such a capacity?
3. Do you currently work or have you ever worked in the construction industry, such as for a general contractor? Have your friends and family ever worked in such a capacity?
4. Have you ever been involved in lawsuit or had another significant experience involving a real estate professional or a construction contractor?
5. Do you currently work or have you ever worked for any New York City agencies? Have your friends and family ever worked in such a capacity?

6. Have you or has anyone you know ever had an experience with affordable housing, such as housing subsidized or sponsored by the New York City Department of Housing Preservation and Development, also known as “HPD,” the New York City Housing Authority, also known as “NYCHA,” or Section 8 housing?
7. Have you or your friends or family ever had a particularly positive or negative experience with a law enforcement officer?
8. Have you or your friends or family ever been the victim of fraud?
9. Have you or your friends or family ever been the victim of extortion?
10. Have you or your friends or family ever had any experiences or encounters with corruption, such as experiences involving the bribery of a public employee?

The government also requests that the Court inquire as to whether the jurors know the defendants, defense counsel or attorneys for the government, or any of the following individuals and entities:

Law Firm of Hymowitz & Freeman

Barbara Valente

George Armstrong

Anthony Armstrong

Bogdan Starzecki

Wendell Walters

Peter Spina

Daniel Magidson

The New York City Housing Partnership

Enterprise Community Loan Foundation

Community Preservation Corporation

334 Marcus Garvey Corporation

SML Development LLC, Lexington Avenue LP, SML Bed Stuy Development LLC, and
Hancock Street SML LLC

MCR Restoration Corporation

Federal Bureau of Investigation

U.S. Department of Housing and Urban Development

U.S. Department of Labor

New York City Department of Investigation

Any of the following addresses in Brooklyn:

964 Greene Avenue

736 Lexington Avenue

752 Lexington Avenue

115 Malcolm X Boulevard

544 Van Buren Street

346 Vernon Avenue

191 Putnam Avenue
750 Lexington Avenue
791 Monroe Street
53 Rochester Avenue
224 Spencer Street
438 Quincy Street
562A Lafayette Avenue
725 Macon Street
792 DeKalb Avenue

In the case of any affirmative responses to the above-listed questions, the government respectfully requests that the Court ask its customary follow-up questions.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/ Cristina M. Posa
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